

ORIGINAL

OFFICIAL FILE

ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

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Interstate Power and Light Company )  
Petition for Approval for Sale of Utility )  
Assets Pursuant to Sections 7-102; Approve )  
the Discontinuance of Service Pursuant to 8- )  
508; Cancellation of Tariffs Pursuant to 9- )  
201 of the Public Utilities Act; and the )  
Granting of all Other Necessary and )  
Appropriate Relief )

Docket No. 05-0835

CHIEF CLERK'S OFFICE

**VERIFIED PETITION FOR LEAVE TO INTERVENE BY DANISCO U.S.A., INC.**

NOW COMES Danisco U.S.A., Inc. ("Danisco"), and pursuant to § 200.200 of the Rules of Practice of the Illinois Commerce Commission ("Commission"), 83 Ill.Admin Code 200.200, Danisco hereby petitions for leave to intervene in the above-captioned proceeding. In support of this petition, Danisco states as follows:

1. On December 22, 2005, Interstate Power and Light Company ("IPL") filed a Verified Petition with the Commission seeking approval of the sale of utility assets, discontinuance of services and cancellation of tariffs pursuant to § 7-102, 8-508 and 9-201 of the Illinois Public Utilities Act ("Act").

2. In the Petition, IPL requests that the Commission approve a transaction pursuant to which IPL will sell certain of its assets to Jo-Carroll Energy, Inc. ("Jo Carroll") consisting of all of IPL's Illinois utility distribution assets used to provide electric and gas services in the State of Illinois.

3. If the proposed transaction is completed, Jo-Carroll will provide electric and gas service to customers currently receiving such services from IPL.

4. Danisco currently receives electric and gas services from IPL for its sweetener manufacturing facility located near Thompson, Illinois. Danisco manufactures sweetener for sale in the U.S. market.

5. Danisco uses a substantial amount of electricity and gas within IPL's Illinois service territory and has a direct and substantial interest in the outcome of this proceeding.

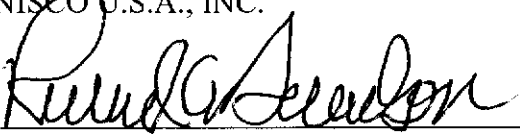
6. Danisco requests that the following person be added to the service list in this proceeding:

Richard A. Davidson  
Lane & Waterman LLP  
224 18<sup>th</sup> Street, Ste. 500  
Rock Island, IL 61201  
563-333-6624  
563-888-7824 Fax  
[rdavidson@l-wlaw.com](mailto:rdavidson@l-wlaw.com)

7. Danisco agrees to accept service by electronic means as provided for in § 200.1050 of the Commission's Rules of Practice (83 Ill.Admin Code 200.1050).

WHEREFORE, Danisco requests that it be granted leave to intervene and be treated as a party to this proceeding pursuant to § 200.200 of the Commission's Rules of Practice.

Respectfully submitted,  
DANISCO U.S.A., INC.

By: 

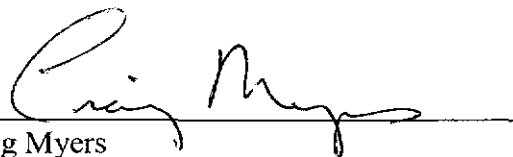
Richard A. Davidson, ARDC #6192561  
One of its attorneys

Richard A. Davidson  
Lane & Waterman LLP  
220 North Main Street, Suite 600  
Davenport, IA 52801  
563-333-6624  
563-888-7841 Fax  
[rdavidson@l-wlaw.com](mailto:rdavidson@l-wlaw.com)

July 28, 2006

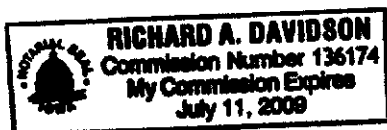
VERIFICATION

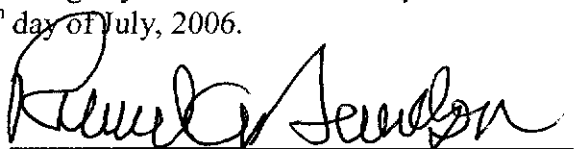
Craig Myers, being first duly sworn, on oath deposes and states that he is the Plant Manager for Danisco U.S.A., Inc., which is located near Thompson, Illinois, that he has read the foregoing Verified Petition for Leave to Intervene, knows the contents thereof, and states that the contents of the Verified Petition for Leave to Intervene are true to the best of his knowledge, information and belief.



Craig Myers

Subscribed and sworn to me this 28<sup>th</sup> day of July, 2006.

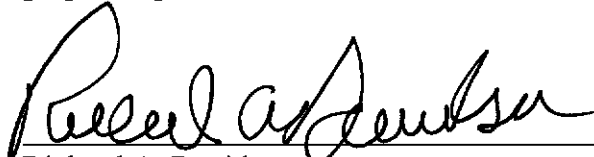




Notary Public

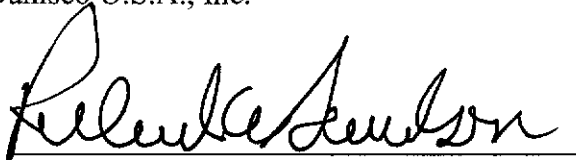
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Verified Petition for Leave to Intervene was served by U.S. Mail, postage prepaid, upon the attached service list on August 1, 2006.

  
Richard A. Davidson

NOTICE OF FILING

On August 2, 2006, we have sent by U.S. Mail, postage prepaid, to the Chief Clerk of the Illinois Commerce Commission, 527 E. Capital Avenue, Springfield, IL 62701, the attached Verified Petition for Leave to Intervene of Danisco U.S.A., Inc.

  
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